

## KOEHLER & ISAACS LLP

RICHARD J. KOEHLER  
STEVEN ISAACS

JEANNETTE BALDASARRE  
A. JAMES BELL  
LIAM L. CASTRO  
SONYA CHAZIN  
RENA C. DAWSON  
CYNTHIA DEVASIA  
GABRIEL GREENBERG  
TALIA HAYNES  
DAVID KIRSCH  
MERCEDES M. MALDONADO  
FELICIA PINTO  
ANDREW ROWE  
JULIE PEARLMAN SCHATZ  
ANN SCHNEIDER  
STEPHANIE SWINTON  
PETER C. TROXLER  
HOWARD G. WIEN

ATTORNEYS AT LAW  
61 BROADWAY, 25TH FLOOR  
NEW YORK, NY 10006  
Tel: (917) 551-1300 Fax: (917) 551-0030  
[www.koehler-isaacs.com](http://www.koehler-isaacs.com)

OF COUNSEL  
RAYMOND J. AAB  
JESSICA SALLES  
BARRY WASHOR

WRITER'S DIRECT DIAL  
(917) 551-1317

The conference currently scheduled for September 24, 2020, is adjourned until October 27, 2020, at 12:00 p.m. In addition, in the interests of justice, time will be excluded until the date of the conference.  
SO ORDERED.

9/23/2020

September 21, 2020

Via ECF

Hon. Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Daniel Daniel, 20Cr101*

Dear Judge Preska:

I am CJA appointed counsel for Mr. Daniel Daniel. This letter is being submitted to request a 30-day adjournment of the upcoming status conference scheduled for September 24<sup>th</sup> at 11 a.m. The adjournment will allow additional time for the Government and Counsel to finalize a pre-trial disposition. In the event that the Court grants the requested adjournment, Counsel consents to the exclusion of time under the Speedy Trial Act. I have spoken with AUSA Jessica Greenwood who consents to the adjournment.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

A. James Bell  
A James Bell, Esq.

Cc: All counsel, by ECF